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**ATTORNEY FOR
TAXCORE LENDING, LLC**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

Robert Parks

Debtor

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CASE NO. 23-30234

**OBJECTION OF TAXCORE LENDING, LLC
TO DEBTOR'S CHAPTER 13 PLAN, AND
WITNESS AND EXHIBIT LIST**

TaxCORE Lending, LLC (the "Lender"), hereby files this Objection (the "Objection") to the most recent Chapter 13 Plan (the "Plan") filed by the above-captioned debtor (the "Debtor") in the above-referenced case, and states:

1. The Lender is the holder of a claim against the Debtor which is secured by a tax lien collateralizing real property which does constitute the Debtor's principal residence. The Plan proposed by the Debtor should not be confirmed because:

- a. The Plan fails to list the Lender as a holder of a senior ad valorem tax lien;
- b. The Plan fails to provide for Lender to receive fixed and equal payments (see 11 U.S.C. § 1325(a)(5)(B)(iii)(I)). 11 U.S.C. § 1325(a)(5)(B)(iii)(I) sets up a specific treatment for allowed secured claims provided for under a plan; they must receive payments in "equal monthly amounts;"
- c. The Plan is not feasible;

- d. The Plan incorrectly designates Lender as an unsecured creditor;
 - e. The Plan lists Lender's claim in the wrong section of the Plan; and
 - f. The Debtor does not appear to have required property insurance in place or has not budgeted for its payment, making the feasibility of the Plan uncertain.
2. Accordingly, confirmation of the Plan should be denied.
 3. Lender hereby identifies the following witnesses:
 1. Robert Parks
 2. Farah Galvan, Servicing Manager, Home Tax Solutions, LLC
 3. Any witness designated by any other party.
 4. Any witness necessary for rebuttal.
 4. Lender hereby identifies the following exhibits:
 1. TaxCORE Lending, LLC's Proof of Claim, including attachments and exhibits.
 2. Any plan filed in this case.
 3. Any schedules and statements of financial affairs filed in this case.
 4. Any exhibit designated by any other party.
 5. Any exhibit necessary for rebuttal.

WHEREFORE, PREMISES CONSIDERED, TaxCORE Lending, LLC respectfully prays that the Court deny confirmation of the Plan, and grant all other relief as just.

Submitted on July 10, 2023.

/s/ Howard Marc Spector
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing pleading was served via electronic means to all parties who receive ECF notice in this case and via United States First Class Mail to the person(s) or entity(ies) listed below and on any list attached hereto on July 10, 2023.

/s/ Howard Marc Spector
Howard Marc Spector